

EXHIBIT 1

Plaintiffs' Responses to Congressional Defendants'
Chart of Elements Not Plausibly Alleged

Claim	Element(s) Plausibly Alleged	Plaintiffs' Responsive Citations
First Amendment (against Congressional Defendants) (Claim I) (¶¶ 157-74)	1. Congressional Defendants coerced Columbia into producing student records	1. SAC at ¶¶ 47, 49, 58, 60-63, 66, 68-72, 134
First Amendment (against Columbia) (Claim III) (¶¶ 182-97)	1. Columbia is a state actor 2. Columbia is being coerced by Congressional Defendants to produce student records	1. SAC at ¶¶ 47, 58, 60-63, 66-134 2. SAC at ¶¶ 47, 58, 60-63, 66-134